

135862

To: ERD/OERR (EPA55113)
To: RRC (EPA9374)
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SPECIAL BULLETIN C
AVTEX FIBERS

FRONT ROYAL, WARREN COUNTY, VA.
CERCLA REMOVAL ENFORCEMENT ACTION

ATTN: HANS CRUMP, GREGG CRYSTALL AND CHARLIE KLEEMAN

I. SITUATION (0900 HRS. 11/11/89)

- A. OSC INFORMED BY BRANCH CHIEF CARNEY OF IMMINENT SHUTDOWN OF THE AVTEX FIBERS FRONT ROYAL PLANT AT 1300 HRS 11/10/89. AVTEX INFORMED TES CONTRACTOR ON-SCENE THAT PLANT WOULD BE SHUTDOWN AT 1600 HRS 11/10/89 IN RESPONSE TO THE REVOCATION OF THEIR NPDES DISCHARGE PERMITS. OSC DIRECTED TO CONTACT VAWCB REPRESENTATIVE ROLAND TO DETERMINE THE FACTS.
- B. OSC REACHED VAWCB 1500 HRS 11/10/89 AND WAS INFORMED THAT AVTEX AND VA AG WERE IN NEGOTIATIONS.
- C. BY 1530 HRS OSC BECAME AWARE OF POSSIBLE NEED FOR EMERGENCY RESPONSE DUE TO THE UNSCHEDULED SHUT DOWN OF THE PLANT PROCESSES WHICH WOULD LEAVE CONSIDERABLE QUANTITIES OF HAZARDOUS MATERIALS ON SITE. VAWCB EXPRESSED CONCERNS OVER PLANT STABILITY AND POTENTIAL DISCHARGES.
- D. AT 1345 HRS OSC WAS FORMALLY INFORMED THAT AVTEX WILL SHUTDOWN THE PLANT. THE COMMONWEALTH OF VIRGINIA RECEIVED A FACSIMILE NOTIFICATION OF SHUTDOWN AND FORMALLY REQUESTED EPA IMPLEMENT A FEDERAL TAKEOVER OF THE FACILITY. THE OSC INFORMED ALL REGIONAL MANAGEMENT.
- E. OSC CONTACTED AVTEX PAT HUGHES TO ASCERTAIN THIER INTENT. AVTEX HAD LAID OFF ALL BUT 8-10 SALARIED EMPLOYEES AT 1700 HRS AND SHUTDOWN ALL THE PLANT PROCESSES. THE POWER PLANT AND THE WASTE WATER TREATMENT OPERATIONS. THEY WERE PREPARED TO "HAND OVER THE KEYS."
- F. AT 1700 HRS. OSC WAS DIRECTED TO COORDINATE AN IMMEDIATE RESPONSE. OSC REQUESTED TAT, ERT AND ERCS TO REPORT ON-SCENE. AND NOTIFIED VADES OF THE RESPONSE. VA TO COORDINATE ALL INVOLVED AGENCIES TO MEET ON-SCENE BETWEEN 10-12 MIDNIGHT 11/10/89.

II. ACTIONS TAKEN:

A. OSC RESPONDED ON-SCENE WITH DIRECTOR OF SUPERFUND OFFICE. VOLTAGGIO - ARRIVING ONSITE AT MIDNIGHT 11/11/89. ALL RESPONDING AGENCIES ON-SCENE REPRESENTED AS FOLLOWS:

VAWCB - 2	VADOL - 1
VAWMA - 1	WARREN COUNTY ES - 1
VADES - 4	FRONT ROYAL POLICE -
VA STATE POLICE - 2	EPA - 3 (1 CEPP-HQ)

B. THE FOLLOWING EMERGENCY ACTIONS AND NEEDS WERE DISCUSSED:

-SITE SECURITY	-WWTP DISCHARGES TO RIVER
-FIRE PROTECTION-RESPONSE	-PLANT SHUTDOWN PROCEDURES
-CS2 TANKS AND INTEGRITY	-VISCOSE IN SYSTEM

C. AVTEX WAS INVITED TO MEETING. AVTEX STATED THAT PERSONNEL ON-SCENE WERE MONITORING PLANT CONDITIONS AND THAT THINGS WERE STABLE. A MEETING WAS SET UP FOR 0900 HRS. 11/11/89.

D. OSC, DES, VAWCB, VAWRA TOURED FACILITY AND NOTED THE FOLLOWING:

- TWO GUARDS AS SECURITY
- PURCHASE POWER- PLANT LIGHTED
- NO EMPLOYEES WERE FOUND DURING TOUR
- WATER SUPPLY OFF AT CARBON DISULFIDE HOLDING AREA
- NO DISCHARGE AT OUTFALLS
- NO FLOWS OF SIGNIFICANCE AT WWTP

OSC RECONVENED INSPECTION GROUP AND NOTED THE FOLLOWING IMMEDIATE NEEDS AND REQUIREMENTS:

- IMMEDIATE AVTEX PRESENCE TO LOCKDOWN AND SECURE CARBON DISULFIDE TANKS
- IMMEDIATE INCREASES IN SECURITY
- IMMEDIATE COORDINATION WITH FIRE DEPARTMENT SINCE ALL WATER FLOWS AT PLANT WERE TURNED OFF
- DETERMINE AVTEX INTENTIONS ASAP

E. OSC ARRANGED FOR 24 HOUR COVERAGE BY DES AND RECONVENED MEETING FOR 0700 HRS 11/11/89.

F. OSC ACTIVATED ERCS AT 0400 HRS. OSC REQUESTED DUTY OFFICER SUSSEEN TO VERIFY ACTIVATION SINCE OSC IS NOT AN ORDERING OFFICER UNDER THIS CONTRACT. ERCS TO BE ON SCENE BY 0700 HRS.

G. MEETING RECONVENED. OSC WAS INFORMED THAT ALL TANKS WERE SECURE. NOTHING UNEXPECTED HAD HAPPENED OVERNIGHT, AND THAT VIRGINIA DES HAD WORKED OUT ALL PRE PLANS. THE CITY OF FRONT ROYAL OFFERED A BUILDING TO BE USED AS AN EMERGENCY OPERATIONS CENTER (EOC). VADES WILL SET UP A COMMAND POST (CP) IN THE PARKING LOT OF THE SITE.

H. 0900 HRS MEETING HELD WITH AVTEX AND INVOLVED AGENCIES.
AVTEX DIRECTED TO TAKE THE FOLLOWING MEASURES:

- REMOVE CARBON DISULFIDE (CS2) ASAP
- RESTART FIRE PUMPS AND HYDRANT SYSTEMS
- REMOVE BULK STORAGE CHEMICALS (INVENTORY IN POLREP 29)

I. OSC DIRECTED ERCS TO PERFORM 24 HOUR FIRE/ SECURITY WATCH.

J. VADES TO MAN CP AND ESTABLISH COMMUNICATIONS.

K. VAWCB TO ASSESS WWTP AND ALL OTHER RIVER DISCHARGES.

III. FUTURE PLANS:

A. AVTEX TO RESPOND TO EPA DIRECTION.

B. COMMAND POST/ EOC TO BE SET UP BY 1200 HRS.

C. VAWCB TO BEGIN RIVER DISCHARGE ASSESSMENT.

D. ERCS TO MAINTAIN CS2 FACILITY AND 24 HR WATCH.

E. TAT TO ARRIVE BY 1400 HRS. (ZONE CROSSOVER)

F. ERT TO ARRIVE BY 1400 HRS. AIR MODELING TO SUPPORT
CONTINGENCY PLANS.

G. VADES AND OSC TO DEVELOP CONTINGENCY PLANS WITH LOCAL
FIRST RESPONDERS.

H. IMMINENT HAZARD ASSESSMENT TO BEGIN 11/12/89.

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